

**Zoning Commission Roundtable**  
**Case No. 22-RT1**  
**September 22, 2022**  
**Jayne Epstein, Ward 3**

Good afternoon. My name is Jayme Epstein. I am a resident of Woodley Park in Ward 3 and a member of Ward 3 Housing Justice, a grassroots group that advocates for deeply affordable housing in Ward 3, and of Empower DC.

I appreciate the opportunity to testify today regarding the Zoning Commission's proposed racial equity tool. I am fully in support of all efforts to use a racial equity lens in zoning decisions and celebrate that advancement in the Comprehensive Plan. I want to live in a neighborhood that reflects the full diversity of the city's residents, both racially and economically, and where the historic exclusion of people of color is no longer perpetuated. I look forward to sharing the high opportunity neighborhood in which I live with neighbors of all racial and economic backgrounds who choose to live here. And I know that that will simply not be the result of the racial equity tool this commission has proposed.

The tool the Zoning Commission has proposed is woefully inadequate. It lacks the necessary substance to affect meaningful change and equitable development outcomes, and it does not meet Comprehensive Plan requirements.

I strongly support the recommendations of Empower DC, especially those that:

- Require a racial equity analysis for all zoning decisions, not just contested cases, and codify the standards for analysis through a zoning text amendment;
- Meaningfully assess displacement risk throughout the impacted community, not just "direct displacement";
- Require the transparent use of current and historic data, disaggregated by race, to identify past and present inequities, as required by the Comprehensive Plan, and require the tracking and reporting of outcomes, including the progress towards closing the racial wealth gap; and
- Require applicants proposing a project in a displacement risk area to take additional steps to address displacement and advance racial equity prior to coming to the Zoning Commission for approval.

In addition, I urge you to adopt a tool that will consider not only the current risk of displacing Black residents, but will also:

- take into account the historic context that has made areas west of Rock Creek Park disproportionately white and wealthy;
- repair the harm of past policies and actions and advance racial equity;

- develop mapping and narrative tools to research and document a community’s specific history of racism in housing and land use before taking further steps to develop policy or plans; and
- both acknowledge this history and take actions that are informed by this research to dismantle systemic racism and barriers to fair housing and community equity across the city.

To that end, I also urge you to consider implementing [tools similar to those used by the city of Seattle, Washington](#), that measure both the displacement risk of a project (the “displacement risk index”) and the level of opportunity in the neighborhood (the “access to opportunity index”) in order to ensure equitable access to all neighborhoods.

In closing, I urge you to adopt a tool that includes all of the recommendations of Empower DC and that ensures that your decisions will increase the ability of all residents of DC to thrive in housing they can afford in every ward of the city. The tools and processes for racial equity analysis must be made mandatory through a zoning text amendment, and there must be accountability and reporting of outcomes.

You have the opportunity to use this moment to begin to reverse the consequences of the shameful history of housing discrimination, exclusion, and displacement in the District. Please use all of the tools available to you to ensure that your decisions truly **advance** racial equity in our city.

Thank you.